

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

WABASH VALLEY POWER)	
ASSOCIATION,)	
)	
Petitioner,)	
)	PCB 16-
v.)	(Permit Appeal – Air)
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF ELECTRONIC FILING

TO:

John Therriault, Assistant Clerk
 Illinois Pollution Control Board
 James R. Thompson Center
 100 West Randolph, Suite 11-500
 Chicago, Illinois 60601
 john.therriault@illinois.gov

Division of Legal Counsel
 Illinois Environmental Protection Agency
 1021 North Grand Avenue, East
 P.O. Box 19276
 Springfield, IL 62794-9276

PLEASE TAKE NOTICE that we have today electronically filed with the Office of the Clerk of the Pollution Control Board, the **APPEARANCE OF THOMAS W. DIMOND**, and **PETITION FOR REVIEW OF CAAPP PERMIT AND REQUEST FOR PARTIAL STAY**, a copy of which has been served on the Illinois Environmental Protection Agency.

/s/ Thomas W. Dimond
 Thomas W. Dimond

Dated July 15, 2015

Thomas W. Dimond
 Ice Miller LLP
 200 West Madison
 Suite 3500
 Chicago, IL 60606
 (312) 726-7125

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**WABASH VALLEY POWER
ASSOCIATION,**

Petitioner,

v.

**ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,**

Respondent.

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) **PCB 16-**
) **(Permit Appeal – Air)**
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APPEARANCE

I hereby file my appearance in this proceeding on behalf of Wabash Valley Power Association.

/s/ Thomas W. Dimond _____
Thomas W. Dimond

Thomas W. Dimond
Ice Miller LLP
200 West Madison
Suite 3500
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thomas.dimond@icemiller.com

Dated: July 15, 2015

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

WABASH VALLEY POWER ASSOCIATION,)	
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Petitioner,)	
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v.)	PCB 16-
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,)	
)	
Respondent.)	

PETITION FOR REVIEW OF CAAPP PERMIT AND REQUEST FOR PARTIAL STAY

NOW COMES Petitioner, Wabash Valley Power Association (“Petitioner” or “WVPA”) pursuant to Section 40.2 of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/40.2) and 35 Ill.Adm.Code § 105.300 *et seq.*, and requests a hearing before the Illinois Pollution Control Board (the "Board") to contest certain conditions contained in the Clean Air Act Permit Program (“CAAPP”) permit¹ (the "permit") issued on June 12, 2015, pursuant to Section 39.5 of the Act (415 ILCS 5/39.5) and attached hereto as Exhibit 1. Pursuant to Section 40.2(a) of the Act and 35 Ill.Adm.Code §§ 105.302(e), this Petition is timely filed with the Board.

In support of its Petition for Review, and its request to stay the conditions that are the subject of the Petition, Petitioner states as follows:

I. BACKGROUND
(35 Ill.Adm.Code § 105.304(a)(1))

1. The Clinton LFGTE Facility, Illinois Environmental Protection Agency (“Agency”) I.D. No. 039808AAE, is a landfill gas to energy facility located at the Clinton Landfill, which is Agency I.D. No. 039808AAC covered by CAAPP Permit 99110013. The

¹ Application No. 07100080; I.D. No. 039808AAE

Agency considers the Clinton LFGTE Facility to be a support facility to Clinton Landfill, but the two sources are operated by separate companies and have elected to obtain separate CAAPP permits. Further, the Clinton LFGTE Facility has no authority to operate or control emission units controlled by Clinton Landfill and for which it is the permittee. The Clinton LFGTE Facility consists primarily of two gas-fired engines rated at 13.75 mmBtu/hr and is located at Route 51 South, Clinton, DeWitt County, Illinois. DeWitt County is attainment for all National Ambient Air Quality Standards. See <http://www.epa.gov/oaqps001/greenbk/ancl.html> (listing non-attainment counties by State and not listing DeWitt County for Illinois, last visited July 13, 2015).

2. The Agency provided Petitioner with a draft permit and invited WVPA to submit comments. Petitioner timely submitted comments on the draft permit.²

3. The Agency issued the permit on June 12, 2015.

II. REQUEST FOR PARTIAL STAY OF THE PERMIT

4. In accordance with Section 40.2(f) of the Act, the Board has granted partial stays in CAAPP permit appeals where a petitioner has so requested. See, e.g., *United States Steel Corp. v. Illinois Environmental Protection Agency*, PCB 13-53, Slip op. at 2 (May 2, 2013) ("Section 40.2(f) of the Act makes clear that contested conditions of a CAAPP permit shall be stayed at the request of the applicant"); see also *Ameren Missouri and Goose Creek Energy Center v. Illinois Environmental Protection Agency*, PCB 15-89, Slip. Op. at 2 (Dec. 4, 2014); *Ameren Missouri and Pinckneyville Energy Center*, PCB 15-134, Slip Op. at 2 (Feb. 5, 2015).

5. Further, a stay of Conditions Section 1, Condition 1.3.b.ii.C.II., Section 3,

² Petitioner has attached the appealed permit as Exhibit 1 to this Petition. The other documents referenced herein, such as the draft permit, Petitioner's comments, and the earlier-issued permit, should be included in the administrative record that Illinois EPA will file with the Board. In the interest of economy, Petitioner is not attaching such documents to this Petition.

Condition 3.2., Section 4, Condition 4.1., Section 4, Condition 4.1.2.a.ii, Testing, A.I. and II., Section 4, Condition 4.2.2.b.ii.B.II.2., Section 4, Condition 4.2.4.a.ii.C.IV. through VII., and Section 4, Condition 4.2.4.a.ii.E.III.2 through 4. is necessary to prevent irreparable harm WVPA and to protect its right to meaningfully appeal permit conditions. Granting of a stay under such conditions has been the Board's historic practice. See e.g. *Midwest Generation, LLC, Will County Generating Station v. Illinois Environmental Protection Agency*, PCB 06-156 (July 20, 2006) (granted stay of the effectiveness of contested conditions of a construction permit); *Dynegy Midwest Generation, Inc. (Vermilion Power Station) v. Illinois Environmental Protection Agency*, PCB 06-194 (October 19, 2006) (granted stay "of the portions of the permit Dynegy contests")

6. WVPA requests in this instance that the Board exercise its authority under 415 ILCS 5/40.2(f) (West 2011) and/or its inherent discretionary authority to grant a partial stay of the CAAPP permit, staying Conditions Section 1, Condition 1.3.b.ii.C.II., Section 3, Condition 3.2., Section 4, Condition 4.1., Section 4, Condition 4.1.2.a.ii, Testing, A.I. and II., Section 4, Condition 4.2.2.b.ii.B.II.2., Section 4, Condition 4.2.4.a.ii.C.IV. through VII., and Section 4, Condition 4.2.4.a.ii.E.III.2 through 4.

III. ISSUES ON APPEAL
(35 Ill.Adm.Code §§ 105.304(a) (2)-(4))

Following is a brief summary of the issues on which WVPA petitions for review and seeks a stay, including identification of the permit conditions appealed and a brief justification as to the reason for the Agency's error, presented in the order the issues arise in the CAAPP permit.

7. Section 1, Condition 1.3.b.i.B. WVPA objects to this condition because it is unauthorized by law and arbitrary and capricious by setting limits for the emission of hazardous air pollutants ("HAPs") of 8 tons per year ("tpy") for any single HAP and 20 tpy for all HAPs

combined. The condition is correct that Clinton Landfill and the Clinton LFGTE Facility, combined, are not a major source of HAPs. However, the regulatory major source thresholds for HAPs are 10 tpy for any single HAP and 25 tpy for all HAPs combined. *See* 415 ILCS 5/39.5(2)(c)(i)(A) (West 2011).

8. Section 1, Condition 1.3.b.ii.C.II. WVPA objects to this condition as it is arbitrary and capricious, unreasonable and unauthorized by law because it requires reporting of emissions of carbon monoxide and hazardous air pollutants that is not required by the Act and is unclear as to the time, the frequency and to whom the report of emissions is to be submitted.

9. Section 3, Condition 3.2. WVPA objects to this condition as it is arbitrary and capricious to the extent it could be interpreted to require the Clinton LFGTE Facility to prepare and submit documents related to emission units under the control of Clinton Landfill. Condition 3.2 requires WVPA to comply with requirements to prepare a Fugitive Particulate Matter Operating Program, a PM₁₀ Contingency Measure Plan, an Episode Action Plan, and a Risk Management Plan for all "emission units (including insignificant activities unless specified otherwise in this Section) at the source." As noted above, the Clinton LFGTE Facility is co-located with Clinton Landfill, but has no power to control emission units under the control and permit of Clinton Landfill.

10. Section 4, Condition 4.1. WVPA objects to this condition because it is unauthorized by law and its imposition is arbitrary, capricious and unreasonable. The condition purports to require the emission units at the Clinton LFGTE Facility to comply with certain portions of the New Source Performance Standards for Municipal Solid Waste Landfills, 40 C.F.R. Part 60, Subpart WWW, that are not applicable based on evidence provided in the application, requires the Clinton LFGTE Facility to obtain a site-specific determination of non-

applicability from the United States Environmental Protection Agency (“EPA”) and refuses to provide for the automatic non-applicability of Condition 4.1 upon delivery of such a site-specific determination to the Agency. Neither Illinois law nor federal law requires such a site-specific determination by EPA, and the emission limits and other conditions in Condition 4.1 are not applicable to the emission units subject to Condition 4.1.

11. Section 4, Condition 4.1.2.a.ii, Testing, A.I. and II. To the extent this condition is not stricken based on the previous comment, WVPA objects to this condition because it is arbitrary and capricious and unreasonable to the extent it purports to require testing of emissions within 60 days of when the emission units are first relied upon as control devices given that other permit conditions require the submission of test protocols 60 days in advance of testing. It would be between impossible and impractical to submit a test protocol on the same day that the emission units are first subject to the testing requirement.

12. Section 4, Condition 4.2.2.b.ii.B.II.2. WVPA objects to this condition because it is arbitrary and capricious and unauthorized by law to the extent it requires the record keeping of information not under the control of the Clinton LFGTE Facility or related to its emission units. This condition requires the record keeping of landfill gas flow that "bypassed the landfill gas treatment systems." Any bypass of the landfill gas treatment systems is directed to the flare under the control of Clinton Landfill and is monitored and recorded by Clinton Landfill.

13. Section 4, Condition 4.2.4.a.ii.C.IV. through VII. WVPA objects to this condition because it is arbitrary and capricious and unreasonable in that it is largely duplicative of the testing requirements in Section 7, Condition 7.1 and in some ways contradicts the requirements of Condition 7.1.

14. Section 4, Condition 4.2.4.a.ii.E.III.2 through 4. WVPA objects to this condition

as it is unauthorized by law, arbitrary and capricious and unreasonable because it requires record keeping related to emissions of volatile organic material/non-methane organic material, particulate matter and total hazardous air pollutants, which is not required for these emission units.

WHEREFORE, for the reasons set forth above, WVPA appeals Conditions Section 1, Condition 1.3.b.ii.C.II.,_Section 3, Condition 3.2., Section 4, Condition 4.1., Section 4, Condition 4.1.2.a.ii, Testing, A.I. and II., Section 4, Condition 4.2.2.b.ii.B.II.2., Section 4, Condition 4.2.4.a.ii.C.IV. through VII., and Section 4, Condition 4.2.4.a.ii.E.III.2 through 4. of the CAAPP permit issued June 12, 2015 for the Clinton LFGTE Facility and requests that the Board order the Agency to delete or modify the conditions as set forth above. Additionally, WVPA requests that the Board stay Conditions Section 1, Condition 1.3.b.ii.C.II.,_Section 3, Condition 3.2., Section 4, Condition 4.1., Section 4, Condition 4.1.2.a.ii, Testing, A.I. and II., Section 4, Condition 4.2.2.b.ii.B.II.2., Section 4, Condition 4.2.4.a.ii.C.IV. through VII., and Section 4, Condition 4.2.4.a.ii.E.III.2 through 4. If the Board stays the conditions appealed herein, WVPA will continue to comply with conditions of the previously issued construction permit and/or other applicable conditions of the CAAPP permit.

Respectfully submitted,

WABASH VALLEY POWER ASSOCIATION

By: /s/ Thomas W. Dimond
One of Its Attorneys

Dated July 15, 2015

Thomas W. Dimond
Ice Miller LLP

200 West Madison
Suite 3500
Chicago, IL 60606
(312) 726-7125

CERTIFICATE OF SERVICE

I, the undersigned, certify that on July 15, 2015, I have served the attached **APPEARANCE OF THOMAS W. DIMOND**, and **PETITION FOR REVIEW OF CAAPP PERMIT AND REQUEST FOR PARTIAL STAY** by Certified U.S. Mail, return receipt requested upon the following person:

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

/s/ Thomas W. Dimond

Thomas W. Dimond

EXHIBIT 1

Attention:

Wabash Valley Power Association
Attn: Environmental Affairs
722 North High School Road
Indianapolis, Indiana 46214

State of Illinois

**CLEAN AIR ACT PERMIT
PROGRAM (CAAPP) PERMIT**

[Title IN and Title V Permit]

Source:

Clinton LFGTE Facility
9560 Heritage Road
Clinton, Illinois 61727

I.D. No.: 039808AAE
Permit No.: 07100080

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
BRUCE RAUNER, GOVERNOR LISA BONNETT, DIRECTOR

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
[Title IN and Title V Permit]

Type of Application: New
Purpose of Application: New Permit to an Existing Major Source

ID No.: 039808AAE
Permit No.: 07100080
Statement of Basis No.: 07100080-1503

Date Application Received: October 23, 2007
Date Issued: June 12, 2015

Expiration Date: June 12, 2020
Renewal Submittal Date: 9 Months Prior to June 12, 2020

Source Name: Clinton LFGTE Facility
Address: 9560 Heritage Road
City: Clinton
County: DeWitt
ZIP Code: 61727

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact John H. Michael at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

REP:MTR:JHM:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database

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Section 1 - Source Information

1. Addresses

Source

Clinton LFGTE Facility
9560 Heritage Road
Clinton, Illinois 61727

Owner

Wabash Valley Power Association
722 North High School Road
Indianapolis, Indiana 46214

Operator

MacAllister Machinery Co., Inc. d/b/a
MacAllister Power Systems
7515 East 30th Street
Indianapolis, Indiana 46214

Permittee

The Owner of the source as identified in this Table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	Name	Title
Responsible Official	Rick Coons	CEO
Delegated Authority	No other individuals have been authorized by the IEPA.	N/A
Delegated Authority	N/A	N/A

Other Contacts

	Name	Phone No.	Email
Source Contact	S. Dear Schramm-Satayathum	317-481-2868	d_schramm@wpva.com
Technical Contact	S. Dear Schramm-Satayathum	317-481-2868	d_schramm@wpva.com
Correspondence	S. Dear Schramm-Satayathum	317-481-2868	d_schramm@wpva.com
Billing	S. Dear Schramm-Satayathum	317-481-2868	d_schramm@wpva.com

3. Single Source

- a. The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

I.D. No.	Permit No.	Single Source Name and Address
039808AAC	99110013	Clinton Landfill Route 51 South Clinton, Illinois 61727

Clinton LFGTE Facility owns and operates a landfill gas to energy facility at Clinton Landfill under CAAPP Permit No. 039808AAC and is considered to be a support facility for the landfill. Clinton Landfill and Clinton LFGTE Facility have elected to obtain separate CAAPP permits.

- b. i. A. Pursuant to Construction Permit 05020070, the total emissions of the source, i.e., Clinton Landfill and Clinton LFGTE Facility, see Section 1.3(a),

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Date Received: 10/23/2007
Date Issued: 06/12/2015

excluding fugitive emissions, shall not exceed 250 tons per year for CO.
[T1]

- B. Pursuant to Permit 99110013, this permit is issued based on the source, i.e., Clinton Landfill and Clinton LFGTE Facility, see Section 1.3(a), not being a major source of emissions of hazardous air pollutants (HAPs). For this purpose, HAP emissions of the source shall not exceed 8 tons per year for any individual HAP and 20 tons per year of any combination of HAPs.
[T1]

Note: This condition is intended to ensure that the affected source continues to not be a major source of HAP emissions for purposes of the NESHAP adopted by USEPA pursuant to Section 112(b) of the Clean Air Act.

ii. Compliance Method

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, the Permittee shall demonstrate compliance with the requirements in Condition 1.3(b)(i), as follows:
- I. Compliance with the emissions limitations in Condition 1.3(b)(i)(A) and (B) shall be verified utilizing the monitoring, recordkeeping, and reporting procedures, required in Section 4.0 and 6.0, i.e., the monitoring, recordkeeping, and reporting procedures used to demonstrate compliance and/or calculate emissions for the emission units and operations covered under the respective section of this permit.
- II. Emissions from the source, i.e., Clinton Landfill and Clinton LFGTE Facility, see Section 1.3(a), for each pollutant shall be based upon the sum of emissions from all applicable emission units and operations at the source. Compliance with annual limits shall be determined from a running total of 12 months of data, i.e., the sum of emissions data for each specific pollutant for the month of record plus the preceding 11 months of data.

Recordkeeping

- B. Pursuant to Sections 39.5(7)(b) and (e) of the Act, as applicable, the Permittee shall keep and maintain records and documentation of the assumptions and/or factors, and calculations used to determine emissions from operations from the source, i.e., Clinton Landfill and Clinton LFGTE Facility, see Section 1.3(a).

Reporting

- C. I. Pursuant to Section 39.5(7)(f) of the Act, within 30 days of discovering a deviation from applicable requirements in Condition 1.3(b)(i), the Permittee shall submit a report to the IEPA, Air Compliance Section in accordance with Condition 3.5(a). All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- II. Pursuant to Section 39.5(7)(f) of the Act, the Permittee shall submit a report of total annual emissions from the source, i.e., Clinton Landfill and Clinton LFGTE Facility, see Section 1.3(a), for each of the pollutants listed in Condition 1.3(b)(i) for each calendar month based upon a running total of 12 months of data, i.e., the sum of emissions data for each specific pollutant for the month of record

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plus the preceding 11 months of data to the IEPA, Air Compliance
Section (See Attachment 3 for Addresses).

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Section 2 - General Permit Requirements**1. Prohibitions**

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

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upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

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- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. Testing

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator: The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. Testing by the IEPA: The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

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requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)(C) of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to the IEPA Compliance Section. Address is included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after April 24, 2015 (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

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- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
- i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
- i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
- ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

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9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]

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- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

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Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.

ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particular matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

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demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145(c), during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145(c).

d. **Future Emission Standards**

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. **Fugitive PM Operating Program**

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

b. **PM₁₀ Contingency Measure Plan**

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. **Episode Action Plan**

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as

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required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.

- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on 03/19/2015, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

As of the date of issuance of this permit, there are no source-wide Title I requirements that need to be included in this Condition.

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), and 3.1(d).
 - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d).

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- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit a Semi-Annual Monitoring Report to the Illinois EPA, Air Compliance Section, summarizing required monitoring and identifying all instances of deviation from the permit, every six months as follows, unless more frequent reporting is required elsewhere in this Permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31

- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

Note: Required monitoring includes all applicable monitoring, testing, recordkeeping, and reporting requirements. This may include monitoring requirements not addressed within the Compliance Method Sections of this Permit.

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

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Section 4 - Emission Unit Requirements

4.1 MSW Landfill Requirements (NSPS WWW, NESHAP AAAA)

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures ¹	Monitoring Devices
Landfill Gas-Fired Engine #1 and #2 each 13.75 mmBtu/hr	NMOC	January 2006	N/A	Landfill Gas Treatment and Landfill Gas-Fired Engine	None

¹ The landfill gas-fired engines are process emission units which are also a control measure relied upon as a "subsequent use" or as a control system designed and operated to reduce NMOC to comply with the requirements of 40 CFR 60 Subpart WWW Municipal Solid Waste Landfills.

2. Applicable Requirements

For the emission units in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Operational and Production Requirements for 40 CFR 60 Subpart WWW

A. Pursuant to 40 CFR 60.752(b)(2), each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, shall comply with 40 CFR 60.752(b)(2).

I. Pursuant to 40 CFR 60.752(b)(2), if the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, the owner or operator shall, pursuant to 40 CFR 60.752(b)(2)(iii), route all the collected gas to a control system that complies with the requirements in 40 CFR 60.752(b)(2)(iii)(C), below:

Pursuant to 40 CFR 60.752(b)(2)(iii)(C), route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of 40 CFR 60.752(b)(2)(iii)(A) or (B).

1. Pursuant to 39.5(a) and (b), the Permittee shall submit a site specific USEPA determination within one year that the LFG is treated as provided by Clinton Landfill, the engines are not control devices and are not subject to the control requirements of the NSPS for Municipal Solid Waste Landfills, 40 CFR 60 Subpart WWW.

Note: This permit is issued based on the Permittee treating the LFG that is combusted at the affected engines (i.e., processing the LFG with compression, de-watering and filtration, with a system designed and operated in accordance with 40 CFR 60.752(b)(iii)(C)). As a consequence, the affected engines are not expected to be subject to the emission standards of the Landfill NSPS, pursuant to site-specific determinations made by USEPA for similar facilities. Compliance with the Landfill NSPS is not expected to be dependent upon the control efficiency for NMOC achieved by the engines and emission testing of the engines is not required pursuant to this NSPS.

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- II. The landfill gas-fired engines shall comply with the following if the landfill gas-fired engines are relied upon to comply with the requirements of 40 CFR 60 Subpart WWW (e.g., the affected NMOC system is unable to treat all landfill gas being used as fuel in the engines):
1. Intentionally left blank.
 2. Pursuant to 40 CFR 60.752(b)(2)(iii)(B), a control system designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3 percent oxygen. The reduction efficiency or parts per million by volume shall be established by an initial performance test to be completed no later than 180 days after the initial startup of the approved control system using the test methods specified in 40 CFR 60.754(d).

Pursuant to 40 CFR 60.752(b)(2)(iii)(B)(2), the control device shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in 40 CFR 60.756.
- III. Pursuant to 40 CFR 60.752(b)(2)(iv), operate the collection and control device installed to comply with 40 CFR 60 Subpart WWW in accordance with the provisions of 40 CFR 60.753, 60.755 and 60.756.
- IV. Pursuant to 40 CFR 60.752(b)(2)(v), the collection and control system may be capped or removed provided that all the conditions of paragraphs (b)(2)(v)(A), (B), and (C) of this section are met:
1. Intentionally left blank.
 2. The collection and control system shall have been in operation a minimum of 15 years; and
 3. Intentionally left blank.
- B. Pursuant to 40 CFR 60.753, each owner or operator of an MSW landfill with a gas collection and control system used to comply with the provisions of 40 CFR 60.752(b)(2)(ii) shall:
- I. Operate the system such that all collected gases are vented to a control system designed and operated in compliance with 40 CFR 60.752(b)(2)(iii). In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour, pursuant to 40 CFR 60.753(e).
 - II. Operate the control or treatment system at all times when the collected gas is routed to the system, pursuant to 40 CFR 60.753(f).
- C. Pursuant to 40 CFR 60.755(e), the provisions 40 CFR 60 Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 5 days for collection systems and shall not exceed 1 hour for treatment or control devices.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to 40 CFR 60.756, except as provided in 40 CFR 60.752(b)(2)(i)(B):
- I. Pursuant to 40 CFR 60.756(b), each owner or operator seeking to comply with 40 CFR 60.752(b)(2)(iii), Condition 4.1.2(a)(i)(A)(II)(2), using an enclosed combustor shall calibrate, maintain, and operate according to the manufacturer's specifications, the following equipment.
1. A temperature monitoring device equipped with a continuous recorder and having a minimum accuracy of ± 1 percent of the temperature being measured expressed in degrees Celsius or ± 0.5 degrees Celsius, whichever is greater.
 2. A device that records flow to or bypass of the control device. The owner or operator shall either:
 - aa. Install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or
 - bb. Secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.
- II. Intentionally left blank.

Testing

- A. Pursuant to 39.5(7)(a) of the Act, the landfill gas-fired engines shall comply with the following if the landfill gas-fired engines are relied upon to comply with the requirements of 40 CFR 60 Subpart WWW (e.g., the affected NMOC system is unable to treat all landfill gas being used as fuel in the engines).
- I. If landfill gas-fired engines are relied upon as a control system for compliance the owner or operator shall conduct VOM/NMOC emissions testing within 60 days of the date that the engines were first relied upon as a control system. The testing shall be conducted by an approved independent testing service during conditions that are representative of maximum emissions using the test methods specified in 40 CFR 60.754(d).
- II. If landfill gas-fired engines are relied upon as a control system for compliance as a result of a malfunction or breakdown of the landfill gas treatment system, the owner or operator shall conduct VOM/NMOC emissions testing within 60 days of the date that the engines were relied upon as a control system for more than 15 days in a calendar year. The testing shall be conducted by an approved independent testing service during conditions that are representative of maximum emissions using the test methods specified in 40 CFR 60.754(d).
- B. Pursuant to 40 CFR 60.754(d), for the performance test required in 40 CFR 60.752(b)(2)(iii)(B), Method 25, 25C, or Method 18 of Appendix A of this Part must be used to determine compliance with the 98 weight-percent

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efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by 40 CFR 60.752(b)(2)(i)(B). Method 3 or 3A shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), Method 25A should be used in place of Method 25. If using Method 18 of Appendix A of this Part, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:

$$\text{Control Efficiency} = (\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}})$$

where,

NMOC_{in} = mass of NMOC entering control device

NMOC_{out} = mass of NMOC exiting control device

- C. Pursuant to 40 CFR 754(b), after the installation of a collection and control system in compliance with 40 CFR 60.755, the owner or operator shall calculate the NMOC emission rate for purposes of determining when the system can be removed as provided in 40 CFR 60.752(b)(2)(v), using the following equation:

$$\text{MNMOC} = 1.89 \times 10^{-3} Q_{\text{LFG}} C_{\text{NMOC}}$$

where,

MNMOC = mass emission rate of NMOC, megagrams per year

Q_{LFG} = flow rate of landfill gas, cubic meters per minute

C_{NMOC} = NMOC concentration, parts per million by volume as hexane

- I. The flow rate of landfill gas, Q_{LFG} , shall be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the control device using a gas flow measuring device calibrated according to the provisions of section 4 of Method 2E of Appendix A of this Part.
- II. The average NMOC concentration, C_{NMOC} , shall be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas moving or condensate removal equipment using the procedures in Method 25C or Method 18 of Appendix A of this Part. If using Method 18 of Appendix A of this Part, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The sample location on the common header pipe shall be before any condensate removal or other gas refining units. The landfill owner or operator shall divide the NMOC concentration from Method 25C of Appendix A of this Part by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane.
- III. The owner or operator may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Administrator.
- D. The Permittee shall comply with all the requirements of Section 7.1.

Recordkeeping

- E. Pursuant to 40 CFR 60.758(b), except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator of a controlled landfill shall keep up-to-date, readily accessible records for the life of the control

equipment of the data listed in 40 CFR 60.758(b)(1) through (b)(4) as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal.

- F. Pursuant to 40 CFR 60.758(c), except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator of a controlled landfill subject to the provisions of this Subpart shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in 40 CFR 60.756 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
- I. Pursuant to 40 CFR 60.758(c)(2), each owner or operator subject to the provisions of this Subpart shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under 40 CFR 60.756.
- G. Pursuant to 40 CFR 60.758(e), except as provided in 40 CFR 60.752(b)(2)(i)(B), each owner or operator subject to the provisions of 40 CFR 60 Subpart WWW shall keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in 40 CFR 60.753, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.

b. i. Operational and Production Requirements for 40 CFR 63 Subpart AAAA

- A. I. Pursuant to 40 CFR 63.1945(e), if your landfill is a new affected source and is an area source meeting the criteria in 40 CFR 63.1935(a)(3), you must comply with the requirements of 40 CFR 63.1955(b) and 63.1960 through 63.1980 by the date your landfill is required to install a collection and control system by 40 CFR 60.752(b)(2) of Subpart WWW.
- II. Pursuant to 40 CFR 63.1945(f), if your landfill is an existing affected source and is an area source meeting the criteria in 40 CFR 63.1935(a)(3), you must comply with the requirements in 40 CFR 63.1955(b) and 63.1960 through 63.1980 by the date your landfill is required to install a collection and control system by 40 CFR 60.752(b)(2) of Subpart WWW, or by January 16, 2004, whichever occurs later.
1. Pursuant to 39.5(a) and (b), the Permittee shall submit a site specific USEPA determination within one year that the LFG is treated as provided by Clinton Landfill No.2, the engines are not control devices and are not subject to the control requirements of the NSPS for Municipal Solid Waste Landfills, 40 CFR 60 Subpart WWW.

Note: This permit is issued based on the Permittee treating the LFG that is combusted at the affected engines (i.e., processing the LFG with compression, de-watering and filtration, with a system designed and operated in accordance with 40 CFR 60.752(b)(iii)(C)). As a consequence, the affected engines are not expected to be subject to the emission standards of the Landfill NSPS, pursuant to site-specific determinations made by USEPA for similar facilities. Compliance with the Landfill NSPS is not expected to be dependent

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upon the control efficiency for NMOC achieved by the engines and emission testing of the engines is not required pursuant to this NSPS.

- B. Pursuant to 40 CFR 63.1950, you are no longer required to comply with the requirements of this Subpart when you are no longer required to apply controls as specified in 40 CFR 60.752(b)(2)(v) of Subpart WWW.
- C. I. Pursuant to 40 CFR 63.1955(a)(1), you must comply with the requirements of 40 CFR Part 60, Subpart WWW.
- II. Pursuant to 40 CFR 63.1955(b), if you are required by 40 CFR 60.752(b)(2) of Subpart WWW to install a collection and control system, you must comply with the requirements in 40 CFR 63.1960 through 63.1985 and with the general provisions of this Part specified in Table 1 of 40 CFR 63 Subpart AAAA.
- III. Pursuant to 40 CFR 63.1955(c), for approval of collection and control systems that include any alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping or reporting provisions, you must follow the procedures in 40 CFR 60.752(b)(2). If alternatives have already been approved under 40 CFR Part 60 Subpart WWW these alternatives can be used to comply with 40 CFR 63 Subpart AAAA, except that all affected sources must comply with the SSM requirements in Subpart A of Part 63 as specified in Table 1 of 40 CFR 63 Subpart AAAA and all affected sources must submit compliance reports every 6 months as specified in 40 CFR 63.1980(a) and (b), including information on all deviations that occurred during the 6-month reporting period. Deviations for continuous emission monitors or numerical continuous parameter monitors must be determined using a 3 hour monitoring block average.
- ii. Compliance Method (Operational and Production Requirements)

General

- A. Pursuant to 40 CFR 63.1960, compliance is determined in the same way it is determined for 40 CFR Part 60, Subpart WWW, including performance testing, monitoring of the collection system, continuous parameter monitoring, and other credible evidence. In addition, continuous parameter monitoring data, collected under 40 CFR 60.756(b)(1), (c)(1), and (d) of Subpart WWW, are used to demonstrate compliance with the operating conditions for control systems. If a deviation occurs, you have failed to meet the control device operating conditions described in this Subpart and have deviated from the requirements of 40 CFR 63 Subpart AAAA. Finally, you must develop a written SSM plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site. Failure to write or maintain a copy of the SSM plan is a deviation from the requirements of 40 CFR 63 Subpart AAAA.
- B. Pursuant to 40 CFR 63.1965, a deviation is defined in 40 CFR 63.1990. For the purposes of the landfill monitoring and SSM plan requirements, deviations include:
- I. A deviation occurs when the control device operating parameter boundaries described in 40 CFR 60.758(c)(1) of Subpart WWW are exceeded.
- II. A deviation occurs when 1 hour or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.

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- III. A deviation occurs when a SSM plan is not developed or maintained on site.
- C. Pursuant to 40 CFR 63.1975, averages are calculated in the same way as they are calculated in 40 CFR Part 60, Subpart WWW, except that the data collected during the events listed in 40 CFR 63.1975 are not to be included in any average computed under this Subpart:
 - I. Monitoring system breakdowns, repairs, calibration checks, and zero (low-level) and high-level adjustments.
 - II. Startups.
 - III. Shutdowns.
 - IV. Malfunctions.

Recordkeeping

- D. Pursuant to 40 CFR 63.1980(a), keep records and reports as specified in 40 CFR Part 60, Subpart WWW with one exception: You must submit the annual report described in 40 CFR 60.757(f) every 6 months.
- E. Pursuant to 40 CFR 63.1980(b), you must also keep records and reports as specified in the general provisions of 40 CFR Part 60 and this Part as shown in Table 1 of 40 CFR 63 Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports.

c. i. Work Practice Requirements

- A. Pursuant to Section 39.5(7)(a) of the Act and 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, the source owner or operator shall, to the extent practicable, maintain and operate any affected engines in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or the USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall conduct inspections of the landfill gas treatment system (i.e., affected facility (i.e., compression, de-watering and filtration, with a system) at least quarterly for the purpose of verifying that these control measures control emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection of the landfill gas treatment system (i.e., affected facility (i.e., compression, de-watering and filtration, with a system) performed along with a maintenance and repair log. These records shall include, at a minimum the following:
 - I. Date and time inspections were performed;

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- II. Name(s) of inspection personnel;
- III. Identification of equipment being inspected;
- IV. Findings of the inspections,;
- V. Operation and maintenance procedures; and
- VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

d. i. Other Requirements

A. Pursuant to Section 39.5(7) (a) of the Act, this permit does not relieve the Permittee:

- I. from the responsibility to comply with all Local, State and Federal regulations which are part of the Illinois State Implementation Plan, as well as all other applicable Federal, State and Local requirements.
- II. from the obligation to undertake further actions as may be needed to eliminate air pollution, including nuisance due to odors.
- IIII. from obtaining any necessary permits from the Illinois EPA, Bureau of Land, for the facility.

ii. Compliance Method (Other Requirements)

Recordkeeping

A. Pursuant to Section 39.5(7) (b) of the Act, the Permittee shall keep a file containing determinations, with supporting documentation, used by the Permittee demonstrate compliance with the other provisions of Condition 4.1.2(d).

3. Non-Applicability Determinations

- a. The landfill gas-fired engines are not subject to 35 IAC Part 220 Nonmethane Organic Compounds, because pursuant to 35 IAC 220.200(b) any MSW landfill that commenced construction, reconstruction, or modification on or after May 30, 1991, is subject to the requirements of 40 CFR 60, Subpart WWW, in lieu of the requirements of 35 IAC Part 220.
- b. The landfill gas-fired engines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the landfill gas-fired engines are subject to a NSPS and/or NESHAP proposed after November 15, 1990 (i.e., 40 CFR 60 Subpart WWW, May 30, 1991; and 40 CFR 63 Subpart AAAA, November 07, 2000), pursuant to 40 CFR 64.2(b) (1) (i).

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7) (f) of the Act. Addresses are included in Attachment 3.

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a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.1.2(a)(i), 4.1.2(b)(i), and 4.1.2(c)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. Pursuant to 40 CFR 60.757, except as provided in 40 CFR 60.752(b)(2)(i)(B):
 - A. Pursuant to 40 CFR 60.757(c), each owner or operator subject to the provisions of 40 CFR 60.752(b)(2)(i) shall submit a collection and control system design plan to the Administrator within 1 year of the first report required under 40 CFR 60.752(b) in which the emission rate equals or exceeds 50 megagrams per year, except as follows:
 - I. If the owner or operator elects to recalculate the NMOC emission rate after Tier 2 NMOC sampling and analysis as provided in 40 CFR 60.754(a)(3) and the resulting rate is less than 50 megagrams per year, annual periodic reporting shall be resumed, using the Tier 2 determined site-specific NMOC concentration, until the calculated emission rate is equal to or greater than 50 megagrams per year or the landfill is closed. The revised NMOC emission rate report, with the recalculated emission rate based on NMOC sampling and analysis, shall be submitted within 180 days of the first calculated exceedance of 50 megagrams per year.
 - II. If the owner or operator elects to recalculate the NMOC emission rate after determining a site-specific methane generation rate constant (k), as provided in Tier 3 in 40 CFR 60.754(a)(4), and the resulting NMOC emission rate is less than 50 Mg/yr, annual periodic reporting shall be resumed. The resulting site-specific methane generation rate constant (k) shall be used in the emission rate calculation until such time as the emissions rate calculation results in an exceedance. The revised NMOC emission rate report based on the provisions of 40 CFR 60.754(a)(4) and the resulting site-specific methane generation rate constant (k) shall be submitted to the Administrator within 1 year of the first calculated emission rate exceeding 50 megagrams per year.

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- B. I. Pursuant to 40 CFR 60.757(e), each owner or operator of a controlled landfill shall submit an equipment removal report to the Administrator 30 days prior to removal or cessation of operation of the control equipment.
1. The equipment removal report shall contain all of the following items:
 - aa. A copy of the closure report submitted in accordance with 40 CFR 60.757(d);
 - bb. A copy of the initial performance test report demonstrating that the 15 year minimum control period has expired; and
 - cc. Dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year.
 2. The Administrator may request such additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met.
- C. I. Pursuant to 40 CFR 60.757(f), each owner or operator of a landfill seeking to comply with 40 CFR 60.752(b)(2) using an active collection system designed in accordance with 40 CFR 60.752(b)(2)(ii) shall submit to the Administrator annual reports of the recorded information in (f)(1) through (f)(6) of 40 CFR 60.757(f). The initial annual report shall be submitted within 180 days of installation and start-up of the collection and control system, and shall include the initial performance test report required under 40 CFR 60.8. For enclosed combustion devices and flares, reportable exceedances are defined under 40 CFR 60.758(c).
1. Value and length of time for exceedance of applicable parameters monitored under 40 CFR 60.756(a), (b), (c), and (d).
 2. Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under 40 CFR 60.756.
 3. Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating.
 4. All periods when the collection system was not operating in excess of 5 days.
- D. I. Pursuant to 40 CFR 60.757(g), each owner or operator seeking to comply with 40 CFR 60.752(b)(2)(iii) shall include the following information with the initial performance test report required under 40 CFR 60.8:
1. A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion;

2. The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;
 3. The documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;
 4. The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area; and
 5. The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
 6. The provisions for the control of off-site migration.
- ii. A. Pursuant to 40 CFR 63.1980(a), you must submit the annual report described in 40 CFR 60.757(f) every 6 months.
- B. Pursuant to 40 CFR 63.1980(b), you must also keep records and reports as specified in the general provisions of 40 CFR Part 60 and this Part as shown in Table 1 of 40 CFR 63 Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports.

c. Other Reporting

Pursuant to 39.5(7)(b), the Permittee shall report to the IEPA Air Compliance Section Within 30 days of changing compliance methods for 40 CFR 60 Subpart WWW in accordance with Condition 4.1.2(a). The report shall include:

- i. Rationale for the change in compliance method, e.g., failure of the landfill gas treatment system.
- ii. Identification of any period when an engine operated with landfill gas that was not properly treated by the landfill gas treatment system, with date, time, duration and description.
- iii. A. Any period when an engine was relied upon or should have been relied upon for compliance with 40 CFR 60 Subpart WWW, i.e. Condition 4.1.2(a)(i)(A)(II)(2), with explanation.

4.2 Landfill Gas Engines (NESHAP 40 CFR 63 Subpart ZZZZ)

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Landfill Gas-Fired Engine #1 13.75 mmBtu/Hr	Opacity, PM, SO ₂ , VOM, CO, NO _x , HAP	01-2006	N/A	None	None
Landfill Gas-Fired Engine #2 13.75 mmBtu/Hr	Opacity, PM, SO ₂ , VOM, CO, NO _x , HAP	01-2006	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

A. Pursuant to 35 IAC 212.123,

I. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b).

ii. Compliance Method (Opacity Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit listed in Condition 4.2.1 in accordance with Method 22 for visible emissions at least once per quarter during the operation of these emission units. If visible emissions are observed, the Permittee shall take corrective action within 24 hours of such observation. Corrective action may include, but is not limited to, shut down of the emission unit, maintenance and repair, and/or adjustment of the equipment. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within one week.

Recordkeeping

B. Pursuant to Section 39.5(7)(b) and (e) of the Act, the Permittee shall keep records for each opacity observation (Method 22) performed. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 24 hours of the observation.

C. The Permittee shall comply with all the requirements of Section 7.1.

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b. i. Sulfur Dioxide Requirements (SO₂)

A. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].

ii. Compliance Method (SO₂ Requirements)

Monitoring

A. Pursuant to Sections 39.5(7)(b), (d) and (f) of the Act, the Permittee shall demonstrate compliance with Condition 4.2.2(b)(i)(A) by performing the following:

I. Sampling and analysis for sulfur content and heat content (Btu/cubic foot) of the landfill gas shall be conducted on at least the following schedule, with the calculations for the sulfur content of collected landfill gas in pounds per hour made using representative hourly values for the volumes of different streams of collected landfill gas. If data has been collected previously under earlier permits, it may be used to comply with the requirements below:

1. Sampling and analysis for sulfur content of landfill gas collected at this landfill shall be conducted on a quarterly basis, until four required samples in a row indicate the overall sulfur content of the landfill gas on an hourly basis is no more than 0.095 pounds (equivalent to SO₂ emissions 0.19 rate pounds per hour), at which time sampling and analysis shall be conducted at least annually.
2. Thereafter, if annually sampling indicates the overall sulfur content of the landfill gas on an hourly basis is more than 0.152 pounds (equivalent to SO₂ emissions of 0.304 pounds per hour) than sampling and analysis on a quarterly basis shall be resumed.
3. Sampling and analysis for heat content of landfill gas collected at this landfill shall be conducted on the same frequency as that of the sulfur sampling.

II. Landfill gas Chemical and Physical Composition: The landfill gas shall be sampled and analyzed for total reduced sulfur (TRS) as per Reference Method 15/16 or ASTM D5504. A written notification of sampling activity and submittal of a formal test protocol for such sampling activity is not required.

For each landfill gas sampling and analysis activity, at least three representative samples of landfill gas will be taken from the header prior to the flare or combustion device. The samples are to be taken consecutively, and shipped to a laboratory expeditiously. If any problems occur with the sample collection, shipping, or analysis, which preclude determination of valid data, then new testing runs should be performed as quickly as possible.

Recordkeeping

B. Pursuant to 39.5(7)(b) of the Act, the Permittee shall maintain the following records:

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- I. 1. The total reduced sulfur (TSR) content of the landfill gas and the results of the compliance procedures pursuant to Condition 4.1.2(b) (ii) (A) with supporting calculations.
 2. The heat content of the landfill gas.
 3. Log of sampling and analysis activity, including measured data, documentation for the sampling and analysis activities.
 - II. Landfill gas flow (scf/month and scf/year):
 1. To the landfill gas treatment systems.
 2. That bypassed the landfill gas treatment systems.
 3. To the landfill gas-fired engines.
 - III. Hourly, monthly and annual emissions of SO₂ from the landfill gas-fired engines (lbs/hour, tons/month and tons/year) with supporting calculations.
 - IV. A file identifying the maximum level(s) of sulfur in landfill gas at which compliance with 35 IAC 214.301 is maintained, with supporting documentation and analysis.
- c. i. Carbon Monoxide Requirements (CO)
- A. CO emissions for the landfill gas-fired engines limited from a Construction Permit are found in Condition 4.2.4(a) (i).
- d. i. Nitrogen Oxide Requirements (NO_x)
- A. NO_x emissions for the landfill gas-fired engines limited from a Construction Permit are found in Condition 4.2.4(a) (i).
- e. i. Operational and Production Requirements
- A. Pursuant to Construction Permit #05020070: [T1]
 - I. Landfill gas shall be the only fuel fired in the landfill gas-fired engines.
 - III. The maximum braking horsepower of each engine shall not exceed 2,233 bhp.
- ii. Compliance Method (Operational and Production Requirements)
- Recordkeeping
- A. Pursuant to 39.5(7) (b) of the Act, the Permittee shall maintain the following records:
 - I. The Permittee shall keep records for this sampling and analysis activity, including both collected data and documentation for the sampling and analysis activities.
- f. i. Work Practice Requirements
- A. I. Pursuant to 40 CFR 63.6(e) (1) (i), at all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air

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pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in paragraph (e)(3) of this section), review of operation and maintenance records, and inspection of the source

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(b) and (d) of the Act, the Permittee shall conduct inspections of the landfill gas-fired engines quarterly for the purpose of verifying that measures for controlling emissions from the associated equipment are in place and being properly implemented.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection of the landfill gas treatment system (i.e., compression, de-watering and filtration, with a system) performed along with a maintenance and repair log. These records shall include, at a minimum the following:
- I. Date and time inspections were performed;
 - II. Name(s) of inspection personnel;
 - III. Identification of equipment being inspected;
 - IV. Findings of the inspections,;
 - V. Operation and maintenance procedures; and
 - VI. A description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

g. i. 40 CFR 63 Subpart ZZZZ Requirements

- A. Pursuant to 40 CFR 63.6590(a)(1)(iii), for stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- B. Pursuant to 40 CFR 63.6595(c), if you own or operate an affected source, you must meet the applicable notification requirements in 40 CFR 63.6645 and in 40 CFR Part 63, Subpart A.

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- C. Pursuant to 40 63.6595(a)(1), if you have an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013.
- D. Pursuant to 40 CFR 63.6603(a), if you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d of 40 CFR 63 Subpart ZZZZ that apply to you. #13 of Table 2d is applicable to this source and is copied below.

Table 2d to Subpart ZZZZ of Part 63 – Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in 40 CFR 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
13. Non-emergency, non-black start stationary RICE which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; ¹ b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	

¹ Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this Subpart.

- E. Pursuant to 40 CFR 63.6625(j), if you own or operate a stationary SI engine that is subject to the work, operation or management practices in Table 2d of 40 CFR 63 Subpart ZZZZ, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2d of 40 CFR 63 Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d of 40 CFR 63 Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

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- F. Pursuant to 40 CFR 63.6605(a), you must be in compliance with the emission limitations, operating limitations, and other requirements in this Subpart that apply to you at all times.
- G. Pursuant to 40 CFR 63.6605(b), at all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- H. Pursuant to 40 63.6625(e)(6), as an owner or operator of an existing non-emergency, non-black start stationary RICE located at an area source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- I. Pursuant to 63.6625(h), if you operate an existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- J. Pursuant to 40 CFR 63.6640(a), you must demonstrate continuous compliance with each requirement in Table 2d of 40 CFR 63 Subpart ZZZZ that apply to you according to methods specified in Table 6.

#9 of Table 6 is applicable to this source, copied below.

Table 6 to Subpart ZZZZ of Part 63 - Continuous Compliance Other Requirements

As stated in 40 CFR 63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
9. existing non-emergency stationary SI RICE located at an area source of HAP which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis,	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

- K. Pursuant to 40 CFR 63.6665, Table 8 of 40 CFR 63 Subpart ZZZZ shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to you. See Condition 7.2.

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ii. Compliance Method (40 CFR 63 Subpart ZZZZ Requirements)Recordkeeping

- A. Pursuant to 40 CFR 63.6655(a), if you must comply with the emission and operating limitations, you must keep the records described in 40 CFR 63.6655(a) (1) through (a) (5), below:
- I. A copy of each notification and report that you submitted to comply with this Subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b) (2) (xiv).
 - II. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - III. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b) (2) (viii).
 - IV. Records of all required maintenance performed on the air pollution control and monitoring equipment.
 - V. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- B. Pursuant to 40 CFR 63.6655(d), you must keep the records required in Table 6 of this Subpart to show continuous compliance with each emission or operating limitation that applies to you.
- C. Pursuant to 40 CFR 63.6655(e) (3), as an owner or operator of an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d of 40 CFR 63 Subpart ZZZZ (i.e., Condition 4.2.4(g) (i)D) you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.
- D. Pursuant to 40 CFR 63.6660:
- I. Your records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b) (1).
 - II. As specified in 40 CFR 63.10(b) (1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - III. You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b) (1).

3. Non-Applicability Determinations

- a. i. The landfill gas-fired engines are not subject to the New Source Performance Standards (NSPS) for Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII, because the landfill gas-fired engines are not compression ignition (CI) internal combustion engines (ICE), as defined by 40 CFR 60.4219.

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- ii. The landfill gas-fired engines are not subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart JJJJ, because the landfill gas-fired engines did not commence construction, modification or reconstructed after June 12, 2006 after June 12, 2006, pursuant to 40 CFR 60.4230(4).
- b. The landfill gas-fired engines are not subject to the Acid Rain Program, 40 CFR 72, because the landfill gas-fired engines did not, as of November 15, 1990, and do not currently, serve a generator with a nameplate capacity of greater than 25 MWe, pursuant to 40 CFR 72.6(b)(2).
- c. The landfill gas-fired engines are not subject to 35 IAC 212.321 or 212.322, due to the unique nature of such units, a process weight rate cannot be set so that such rules cannot reasonably be applied, pursuant to 35 IAC 212.323.
- d. The landfill gas-fired engines are not subject to 35 IAC 216.121 because the landfill gas-fired engines are not fuel combustion units, as defined by 35 IAC 211.2470.
- e. i. The landfill gas-fired engines are not subject to 35 IAC 217 Subpart Q, because the landfill gas-fired engines are notwithstanding 35 IAC 217.386(a)(2), an affected unit is not subject to the requirements of 35 IAC 217 Subpart Q if the engine or turbine is or has been used to control emissions from landfills, where at least 50 percent of the heat input is gas collected from a landfill, pursuant to 35 IAC 217.386(b)(3).
- ii. The landfill gas-fired engines are not subject to 35 IAC 217.141 because the landfill gas-fired engines are not fuel combustion units, as defined by 35 IAC 211.2470.
- f. The landfill gas-fired engines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources because the landfill gas-fired engines do not use an add-on control device to achieve compliance with an emission limitation or standard.

4. Other Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Title I Requirements (Construction Permit 05020070) [T1]

A. Pursuant to Construction Permit 05020070, 4(a)(iii). [T1].

Pollutants	NO _x	CO
(Lbs/Hour)	9.8	46.2
(Tons/Year)	43.0	202.0

ii. Compliance Method (Construction Permit 05020070)

- A. Annual compliance with annual limits in Condition 4.2.4(a)(i)(A) shall be determined from a running total of 12 months of data, i.e., the sum of emissions data for the month of record plus the preceding 11 months of data.
- B. Except when emissions of a pollutant are being tested as required by Condition 4.2.4(a)(ii)(C), compliance with the limits in Condition 4.2.4(a)(i)(A) shall be determined as follows:
 - I. For each pollutant other than SO₂, emissions shall be determined from the product of appropriate emission factors and the relevant operating data for the source, as follows:

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1. Factors in lb/SCF of landfill gas and the flow rate of landfill gas to the landfill gas-fired engines, as monitored pursuant to Condition 4.1.2(a)(ii)(A) (i.e., 40 CFR 60.756(b)); or
2. Factors in lbs/mmBtu from landfill gas and the flow rate of landfill gas to the landfill gas-fired engines, as monitored pursuant to Condition 4.1.2(a)(ii)(A) (i.e., 40 CFR 60.756(b)), converted into mmBtu; or
3. Factors in lbs/hour, which addresses operation of the landfill gas-fired engines at their design capacity.

The order of preference for the basis of such factors shall be: 1) on-site emission testing, 2) manufacturer's emission data, and 3) emission factors from USEPA's *Compilation of Air Pollutant Emission*, AP-42.

- II. For SO₂, emissions shall be determined using emission factors in lbs/SCF developed from representative sampling and analysis of the landfill gas being generated by this landfill as required by Condition 4.2.4(b)(ii)(A).
- III. On-site emission testing for pollutant which have been tested as required by Condition 4.2.4(a)(ii)(C), emissions shall be determined using emission factors in lbs/SCF developed those tests.

Testing

- C. I. Pursuant to 39.5(7)(c) of the Act, the Permittee shall have performance tests conducted for the emissions of the landfill gas-fired engines by an approved independent testing service during conditions that are representative of maximum emissions as follows:
 1. aa. If based on the recordkeeping required by Condition 4.2.4(a)(ii)(E)(III)(3), the landfill gas-fired engines emit more than 80% of the total annual emissions for the gas-to-energy facility (i.e., less than an 80% margin of compliance), copied below, the Permittee shall test for that pollutant whose emissions exceed within 90 days.

Pollutant	Permitted tpy	80% tpy
CO	202.0	161.6
NO _x	43.0	34.4
 - bb. The test shall be conducted on the landfill gas engine which had the highest contribution to the total emissions over the preceding year (i.e., running 12 month average).
 - cc. After a test is required and conducted pursuant to Condition 4.2.4(a)(ii)(C)(I)(1)(AA), further testing under that condition is not required more frequently than five years after the test conducted under.
- II. Within 90 days of a written request from the Illinois EPA, or the date agreed upon by the Illinois EPA, whichever is later, testing shall be conducted for emissions of NO_x, CO, PM, SO₂, and NMOC/VOM, as specified in the request.

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II. Unless otherwise specified, each test shall consist of three separate runs each of at least sixty (60) minutes in duration. For the purpose of determining, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Illinois EPA approval, be determined using the arithmetic mean of the results of the two other runs.

III. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A.

Sample and Velocity Traverses	USEPA Method 1
Stack Gas Velocity and Volumetric Flow Rate	USEPA Method 2
Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight	USEPA Method 3
Moisture Content in Stack Gases	USEPA Method 4
Particulate Emissions	USEPA Method 5
Sulfur Dioxide Emissions (SO ₂)	USEPA Method 6
Nitrogen Oxide Emissions	USEPA Method 7
Visual Determination of Opacity	USEPA Method 9
Carbon Monoxide Emissions	USEPA Method 10
Total Gaseous Nonmethane Organic Emissions as Carbon	USEPA Method 25 or 18

IV. At least 60 days prior to the actual date of testing a written test plan shall be submitted to the Illinois EPA for review and approval. This plan shall describe the specific procedures for testing, including as a minimum:

1. The name and identification of the affected unit(s);
2. The person(s) who will be performing sampling and analysis and their experience with similar tests.
3. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined.
4. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
5. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods.
6. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification.
7. Any proposed use of an alternative test method, with detailed justification.
8. The format and content of the Source Test Report.

- V. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual test date.
 - VI. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 30 days after the test results are compiled and finalized. The Final Report shall include as a minimum:
 - 1. A summary of results.
 - 2. General information.
 - 3. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - 4. Detailed description of test conditions, including:
 - aa. Total flow of landfill gas to the facility;
 - bb. Engine operating parameters, i.e., landfill gas flow to the engine, average engine cylinder combustion temperature, RPM, etc.
 - 5. Data and calculations, including copies of all raw data sheets and records of laboratory analysis, sample calculations, and data on equipment calibration.
 - VII. The results of all quality control evaluations, including a copy of all quality control data.
- D. The Permittee shall comply with all the requirements of Section 7.1.

Recordkeeping

- E. Pursuant to 39.5(7)(b) and (e) of the Act, and Construction Permit 05020070, the Permittee shall keep the following records:
 - I. Operation of the landfill gas-fired engines:
 - 1. Manufacturer's data for each landfill gas-fired engine including emissions guarantees, horsepower rating and rated heat input capacity (mmBtu/hour), and operating and maintenance procedures recommended by the manufacturer.
 - 2. A file containing the maximum hourly emission rates (lbs/hour) for NO_x, CO, SO₂, PM/PM₁₀, VOM/NMOC and HAPs, with supporting data and engineering calculations.
 - II. Operating log and other records for the landfill gas-fired engines:
 - 1. The operating schedule of each landfill gas-fired engines.
 - 2. Identification of any period when the landfill gas-fired engines operated with landfill gas that was not properly treated by the treatment system, with date, time, duration and description.

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3. Identification of any period when the landfill gas-fired engines continued to operate after a malfunction or breakdown of the landfill gas-fired engine's combustion system, with date, time, duration and description.
4. Inspection, maintenance and repair logs with dates and the nature of such activities for each landfill gas-fired engines and the affected systems.

III. Emissions of the landfill gas-fired engines:

1. Records for the sulfur and heat content of the landfill gas received at the facility* and the landfill gas used in the landfill gas-fired engines, based on representative sampling and analysis conducted pursuant 4.2.2(b) (ii) (A).

* This data may be collected by the associated landfill.
2. A file containing: 1) The emission factors used by the Permittee for calculating emissions from the landfill gas-fired engines, with supporting documentation; and 2) Engineering calculations for the maximum hourly emissions of NO_x, CO, SO₂, PM/PM₁₀, VOM/NMOC and Total HAPs from the engines.
3. Records of emissions of NO_x, CO, SO₂, PM, VOM/NMOC, and total HAPs (tons/month and tons/year) of the affected landfill gas-fired engines, with supporting documentation and calculations.
4. Records of emissions of NO_x, CO, SO₂, PM, VOM/NMOC, and total HAPs (tons/month and tons/year) of the source, i.e., the combination of the affected facility and associated landfill, with supporting documentation and calculations, which shall be compiled on at least a quarterly basis. For this purpose, for the emissions from the associated landfill, the Permittee may on a routine basis obtain a copy of the emission data from the operator of the landfill, with supporting documentation and calculations.
5. A file identifying the maximum level(s) of sulfur in landfill gas at which compliance with 35 IAC 214.301 is maintained, with supporting documentation and analysis.

IV. Records related to flow of landfill gas (scf/month and scf/year):

1. Landfill gas flow to the landfill gas treatment systems.
2. Landfill gas flow to the facility that bypassed the landfill gas treatment systems.
3. Landfill gas flow to the landfill gas-fired engines.

V. Records related to startup of each landfill gas-fired engine:

1. Date, time and duration of each startup; and
2. Description of the startup, if written operating procedures are not followed during the startup or a significant problem occurs during the startup including detailed explanation.

b. i. Operational Flexibility Requirements - Provisions for Maintenance, Repair, and Replacement of Affected Engines

A. Pursuant to this CAAPP Permit #07100080: [T1N]

- I. This permit authorizes installation of manufacturer supplied replacement landfill gas-fired engine or engine components for the landfill gas-fired engines that takes place either as part of scheduled maintenance of the landfill gas-fired engines or in the event of malfunction or unscheduled outage and subsequent repairs. This authorization does not address activities for which a construction permit is not required, such as routine preventive maintenance, minor replacement of landfill gas-fired engine components or assemblies, or activities that do not involve, either directly or indirectly, emission-related components.
- II. This authorization is limited to activities that can be accommodated by the original installation of the landfill gas-fired engines and that are performed in conjunction with an ongoing program of maintenance, repair, and replacement, so as to not constitute a modification of the landfill gas-fired engines with respect to the PSD. The replacement landfill gas-fired engine or engine component must be in good operating condition and come from either a manufacturer or dealer/service provider. This authorization does not extend to installation of a replacement landfill gas-fired engine that is a different make and model than the original landfill gas-fired engine, or to activities that are intended to or would have the result of, increasing the design capacity of a landfill gas-fired engine.
- III. This authorization does not relax or otherwise revise any requirements and conditions that apply to the operation of the landfill gas-fired engines, including applicable emission limits, monitoring, testing, recordkeeping, and reporting requirements of the CAAPP permit or construction permit issued for the affected facility, which shall continue to apply to the landfill gas-fired engines.
- IV. This authorization also does not excuse the Permittee from any new regulatory requirements that are adopted and applicable to the landfill gas-fired engines.
- V. The authorization provided for the landfill gas-fired engines pursuant to this Condition will terminate when a landfill gas-fired engine is permanently removed from service or 30 days after notification from the Illinois EPA that this authorization is being terminated, whichever occurs first.

ii. Compliance Method

Testing

A. Pursuant to this CAAPP Permit #07100080: [T1N]

- i. The Permittee shall have performance testing conducted on a landfill gas-fired engine following replacement of components or assemblies, if requested by the Illinois EPA, within 120 days of such request or other mutually agreed upon timeframe.
- ii. The Permittee shall comply with all the requirements of section 7.1.

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Recordkeeping

- B. Pursuant to this CAAPP Permit #07100080: [T1N]
- I. The Permittee shall maintain following records at the source for the replacement activities authorized by this permit:
1. A file containing the paperwork for original and replacement landfill gas-fired engine components or engines, including documentation for engine model numbers and serial numbers and copies of the specifications for the landfill gas-fired engines.
 2. Details of activities performed pursuant to this permit including the date that the landfill gas-fired engine is removed from the service and the date the landfill gas-fired engine is returned to service.
- II. The records required by Condition 4.2.4(c)(ii)(B)(i)(A) shall be retained for at least five years after the date that the landfill gas-fired engine is permanently removed from the service.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Condition 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), 4.2.2(f)(i), and 4.2.2(g)(i).
 - II. Requirements in Conditions 4.2.4(a)(i), and 4.2.4(b)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

b. Federal Reporting

- i. 40 CFR 63 Subpart ZZZZ

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- A. Pursuant to 40 CFR 63.6640(b), you must report each instance in which you did not meet each emission limitation or operating limitation in Table 2d of 40 CFR 63 Subpart ZZZZ that apply to you (i.e., Condition 4.2.4(g)(i)(D). These instances are deviations from the emission and operating limitations in 40 CFR 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR 63.6650.
- B. Pursuant to 40 CFR 63.6640(e), you must also report each instance in which you did not meet the requirements in Table 8 to 40 CFR 63.6650 that apply to you. See Condition 7.2.

c. Other Reporting

- i. Pursuant to this CAAPP Permit #0710080: [T1N]
 - A. The Permittee shall notify the Illinois EPA prior to carrying out activities pursuant to this Condition 4.2.4(b). This notification shall be submitted at least 15 days in advance or as soon as it is practicable to do so, e.g., in the event of landfill gas-fired engine failure. This notification shall include:
 - I. A description of the activities that are to be performed and the expected schedule for the activities.
 - II. A confirmation that the activities fall within the authorization provided by this permit, the replacement landfill gas-fired engine or engine component is in good operating conditions and the outage of a landfill gas-fired engine will not interfere with compliance with applicable requirements, with supporting information.

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Section 5 - Additional Title I Requirements

This Section is reserved for Title I requirements not specified in Sections 3 or 4. As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

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Section 6 - Insignificant Activities Requirements**1. Insignificant Activities Subject to Specific Regulations**

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Diaphragm Pumps (Oil and coolant transfer pumps)	2	35 IAC 201.210(a) (8)
Coolant Tanks (Engine coolant storage tanks)	2	35 IAC 201.210(a) (10)
Oil Tanks (Lubricating oil storage tanks)	2	35 IAC 201.210(a) (11)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- c. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

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- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):
 - A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
- iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212(c) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

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Section 7 - Other Requirements**1. Testing**

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
- i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.5(7)(a) of the Act as follows:
- i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

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no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.5(7)(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

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2. 40 CFR 63 Subpart A Requirements (NESHAP)**a. 40 CFR 63 Subpart A and Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines**

Pursuant to 40 CFR 63 Subpart A and Subpart ZZZZ, the Permittee shall comply with the following applicable General Provisions as indicated:

General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.1	Yes	General applicability of the General Provisions	Additional terms defined in 40 CFR 63.6675.
40 CFR 63.2	Yes	Definitions	
40 CFR 63.3	Yes	Units and abbreviations	
40 CFR 63.4	Yes	Prohibited activities and circumvention	
40 CFR 63.5	Yes	Construction and reconstruction	
40 CFR 63.6(a)	Yes	Applicability	
40 CFR 63.6(b)(1)-(4)	Yes	Compliance dates for new and reconstructed sources	
40 CFR 63.6(b)(5)	Yes	Notification	
40 CFR 63.6(b)(6)		[Reserved]	
40 CFR 63.6(b)(7)	Yes	Compliance dates for new and reconstructed area sources that become major sources	
40 CFR 63.6(c)(1)-(2)	Yes	Compliance dates for existing sources	
40 CFR 63.6(c)(3)-(4)		[Reserved]	
40 CFR 63.6(c)(5)	Yes	Compliance dates for existing area sources that become major sources	
40 CFR 63.6(d)		[Reserved]	
40 CFR 63.6(e)	No	Operation and maintenance	
40 CFR 63.6(f)(1)	No	Applicability of standards	
40 CFR 63.6(f)(2)	Yes	Methods for determining compliance	
40 CFR 63.6(f)(3)	Yes	Finding of compliance	
40 CFR 63.6(g)(1)-(3)	Yes	Use of alternate standard	Subpart ZZZZ does not contain opacity or visible emission standards.
40 CFR 63.6(h)	No	Opacity and visible emission standards	
40 CFR 63.6(i)	Yes	Compliance extension procedures and criteria	
40 CFR 63.6(j)	Yes	Presidential compliance exemption	Subpart ZZZZ contains performance test dates at 40 CFR 40 CFR 63.6610, 63.6611, and 63.6612.

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General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.7(a) (1) - (2)	Yes	Performance test dates	
40 CFR 63.7(a) (3)	Yes	CAA section 114 authority	Except that 40 CFR 63.7(b) (1) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(b) (1)	Yes	Notification of performance test	Except that 40 CFR 63.7(b) (2) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(b) (2)	Yes	Notification of rescheduling	Except that 40 CFR 63.7(c) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(c)	Yes	Quality assurance/test plan	
40 CFR 63.7(d)	Yes	Testing facilities	Subpart ZZZZ specifies conditions for conducting performance tests at 40 CFR 63.6620.
40 CFR 63.7(e) (1)	No	Conditions for conducting performance tests	Subpart ZZZZ specifies test methods at 40 CFR 63.6620.
40 CFR 63.7(e) (2)	Yes	Conduct of performance tests and reduction of data	
40 CFR 63.7(e) (3)	Yes	Test run duration	
40 CFR 63.7(e) (4)	Yes	Administrator may require other testing under section 114 of the CAA	
40 CFR 63.7(f)	Yes	Alternative test method provisions	
40 CFR 63.7(g)	Yes	Performance test data analysis, recordkeeping, and reporting	
40 CFR 63.7(h)	Yes	Waiver of tests	Subpart ZZZZ contains specific requirements for monitoring at 40 CFR 63.6625.
40 CFR 63.8(a) (1)	Yes	Applicability of monitoring requirements	
40 CFR 63.8(a) (2)	Yes	Performance specifications	
40 CFR 63.8(a) (3)		[Reserved]	
40 CFR 63.8(a) (4)	No	Monitoring for control devices	
40 CFR 63.8(b) (1)	Yes	Monitoring	
40 CFR 63.8(b) (2) - (3)	Yes	Multiple effluents and multiple monitoring systems	
40 CFR 63.8(c) (1)	Yes	Monitoring system operation and maintenance	
40 CFR 63.8(c) (1) (i)	No	Routine and predictable SSM	
40 CFR 63.8(c) (1) (ii)	Yes	SSM not in Startup Shutdown Malfunction Plan	
40 CFR 63.8(c) (1) (iii)	No	Compliance with operation and maintenance requirements	
40 CFR 63.8(c) (2) - (3)	Yes	Monitoring system installation	Except that Subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
40 CFR 63.8(c) (4)	Yes	Continuous monitoring system (CMS) requirements	Subpart ZZZZ does not require COMS.

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General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.8(c)(5)	No	COMS minimum procedures	Except that Subpart ZZZZ does not require COMS.
40 CFR 63.8(c)(6)-(8)	Yes	CMS requirements	
40 CFR 63.8(d)	Yes	CMS quality control	Except for 40 CFR 63.8(e)(5)(ii), which applies to COMS.
40 CFR 63.8(e)	Yes	CMS performance evaluation	
	Except that 40 CFR 63.8(e) only applies as specified in 40 CFR 63.6645.		Except that 40 CFR 63.8(f)(4) only applies as specified in 40 CFR 63.6645.
40 CFR 63.8(f)(1)-(5)	Yes	Alternative monitoring method	Except that 40 CFR 63.8(f)(6) only applies as specified in 40 CFR 63.6645.
40 CFR 63.8(f)(6)	Yes	Alternative to relative accuracy test	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at 40 CFR 40 CFR 63.6635 and 63.6640.
40 CFR 63.8(g)	Yes	Data reduction	
40 CFR 63.9(a)	Yes	Applicability and State delegation of notification requirements	Except that 40 CFR 63.9(b)(3) is reserved.
40 CFR 63.9(b)(1)-(5)	Yes	Initial notifications	
	Except that 40 CFR 63.9(b) only applies as specified in 40 CFR 63.6645.		Except that 40 CFR 63.9(c) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(c)	Yes	Request for compliance extension	Except that 40 CFR 63.9(d) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(d)	Yes	Notification of special compliance requirements for new sources	Except that 40 CFR 63.9(e) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(e)	Yes	Notification of performance test	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.9(f)	No	Notification of visible emission (VE)/opacity test	Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(g)(1)	Yes	Notification of performance evaluation	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.9(g)(2)	No	Notification of use of COMS data	If alternative is in use.
40 CFR 63.9(g)(3)	Yes	Notification that criterion for alternative to RATA is exceeded	
	Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.		Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. 40 CFR 63.9(h)(4) is reserved.
40 CFR 63.9(h)(1)-(6)	Yes	Notification of compliance status	Except that 40 CFR 63.9(h) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(i)	Yes	Adjustment of submittal deadlines	

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General Provision Citation	General Provision Applicable?	Subject of Citation	Explanation (if required)
40 CFR 63.9(j)	Yes	Change in previous information	
40 CFR 63.10(a)	Yes	Administrative provisions for recordkeeping/reporting	Except that the most recent 2 years of data do not have to be retained on site.
40 CFR 63.10(b)(1)	Yes	Record retention	
40 CFR 63.10(b)(2)(i)-(v)	No	Records related to SSM	
40 CFR 63.10(b)(2)(vi)-(xi)	Yes	Records	
40 CFR 63.10(b)(2)(xii)	Yes	Record when under waiver	For CO standard if using RATA alternative.
40 CFR 63.10(b)(2)(xiii)	Yes	Records when using alternative to RATA	
40 CFR 63.10(b)(2)(xiv)	Yes	Records of supporting documentation	
40 CFR 63.10(b)(3)	Yes	Records of applicability determination	Except that 40 CFR 63.10(c)(2)-(4) and (9) are reserved.
40 CFR 63.10(c)	Yes	Additional records for sources using CEMS	
40 CFR 63.10(d)(1)	Yes	General reporting requirements	
40 CFR 63.10(d)(2)	Yes	Report of performance test results	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.10(d)(3)	No	Reporting opacity or VE observations	
40 CFR 63.10(d)(4)	Yes	Progress reports	
40 CFR 63.10(d)(5)	No	Startup, shutdown, and malfunction reports	
40 CFR 63.10(e)(1) and (2)(i)	Yes	Additional CMS Reports	Subpart ZZZZ does not require COMS.
40 CFR 63.10(e)(2)(ii)	No	COMS-related report	Except that 40 CFR 63.10(e)(3)(i)(C) is reserved.
40 CFR 63.10(e)(3)	Yes	Excess emission and parameter exceedances reports	Subpart ZZZZ does not require COMS.
40 CFR 63.10(e)(4)	No	Reporting COMS data	
40 CFR 63.10(f)	Yes	Waiver for recordkeeping/reporting	
40 CFR 63.11	No	Flares	
40 CFR 63.12	Yes	State authority and delegations	
40 CFR 63.13	Yes	Addresses	
40 CFR 63.14	Yes	Incorporation by reference	
40 CFR 63.15	Yes	Availability of information	

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Table 8 to Subpart ZZZZ of Part 63 - Applicability of General Provisions to Subpart ZZZZ.
As stated in 40 CFR 63.6665, you must comply with the following applicable general provisions.

General provisions citation	Subject of citation	Applies to Subpart	Explanation
40 CFR 63.1	General applicability of the General Provisions	Yes	
40 CFR 63.2	Definitions	Yes	Additional terms defined in 40 CFR 63.6675.
40 CFR 63.3	Units and abbreviations	Yes	
40 CFR 63.4	Prohibited activities and circumvention	Yes	
40 CFR 63.5	Construction and reconstruction	Yes	
40 CFR 63.6(a)	Applicability	Yes	
40 CFR 63.6(b) (1) - (4)	Compliance dates for new and reconstructed sources	Yes	
40 CFR 63.6(b) (5)	Notification	Yes	
40 CFR 63.6(b) (6)	[Reserved]		
40 CFR 63.6(b) (7)	Compliance dates for new and reconstructed area sources that become major sources	Yes	
40 CFR 63.6(c) (1) - (2)	Compliance dates for existing sources	Yes	
40 CFR 63.6(c) (3) - (4)	[Reserved]		
40 CFR 63.6(c) (5)	Compliance dates for existing area sources that become major sources	Yes	
40 CFR 63.6(d)	[Reserved]		
40 CFR 63.6(e)	Operation and maintenance	No	
40 CFR 63.6(f) (1)	Applicability of standards	No	
40 CFR 63.6(f) (2)	Methods for determining compliance	Yes	
40 CFR 63.6(f) (3)	Finding of compliance	Yes	
40 CFR 63.6(g) (1) - (3)	Use of alternate standard	Yes	
40 CFR 63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
40 CFR 63.6(i)	Compliance extension procedures and criteria	Yes	
40 CFR 63.6(j)	Presidential compliance exemption	Yes	
40 CFR 63.7(a) (1) - (2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at 40 CFR 40 CFR 63.6610, 63.6611, and 63.6612.
40 CFR 63.7(a) (3)	CAA section 114 authority	Yes	

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General provisions citation	Subject of citation	Applies to Subpart	Explanation
40 CFR 63.7(b)(1)	Notification of performance test	Yes	Except that 40 CFR 63.7(b)(1) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(b)(2)	Notification of rescheduling	Yes	Except that 40 CFR 63.7(b)(2) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(c)	Quality assurance/test plan	Yes	Except that 40 CFR 63.7(c) only applies as specified in 40 CFR 63.6645.
40 CFR 63.7(d)	Testing facilities	Yes	
40 CFR 63.7(e)(1)	Conditions for conducting performance tests	No	Subpart ZZZZ specifies conditions for conducting performance tests at 40 CFR 63.6620.
40 CFR 63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at 40 CFR 63.6620.
40 CFR 63.7(e)(3)	Test run duration	Yes	
40 CFR 63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes	
40 CFR 63.7(f)	Alternative test method provisions	Yes	
40 CFR 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
40 CFR 63.7(h)	Waiver of tests	Yes	
40 CFR 63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at 40 CFR 63.6625.
40 CFR 63.8(a)(2)	Performance specifications	Yes	
40 CFR 63.8(a)(3)	[Reserved]		
40 CFR 63.8(a)(4)	Monitoring for control devices	No	
40 CFR 63.8(b)(1)	Monitoring	Yes	
40 CFR 63.8(b)(2) - (3)	Multiple effluents and multiple monitoring systems	Yes	
40 CFR 63.8(c)(1)	Monitoring system operation and maintenance	Yes	
40 CFR 63.8(c)(1)(i)	Routine and predictable SSM	No	
40 CFR 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes	
40 CFR 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No	
40 CFR 63.8(c)(2) - (3)	Monitoring system installation	Yes	
40 CFR 63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that Subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).

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General provisions citation	Subject of citation	Applies to Subpart	Explanation
40 CFR 63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
40 CFR 63.8(c)(6)-(8)	CMS requirements	Yes	Except that Subpart ZZZZ does not require COMS.
40 CFR 63.8(d)	CMS quality control	Yes	
40 CFR 63.8(e)	CMS performance evaluation	Yes	Except for 40 CFR 63.8(e)(5)(ii), which applies to COMS.
		Except that 40 CFR 63.8(e) only applies as specified in 40 CFR 63.6645.	
40 CFR 63.8(f)(1)-(5)	Alternative monitoring method	Yes	Except that 40 CFR 63.8(f)(4) only applies as specified in 40 CFR 63.6645.
40 CFR 63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that 40 CFR 63.8(f)(6) only applies as specified in 40 CFR 63.6645.
40 CFR 63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at 40 CFR 40 CFR 63.6635 and 63.6640.
40 CFR 63.9(a)	Applicability and State delegation of notification requirements	Yes	
40 CFR 63.9(b)(1)-(5)	Initial notifications	Yes	Except that 40 CFR 63.9(b)(3) is reserved.
		Except that 40 CFR 63.9(b) only applies as specified in 40 CFR 63.6645.	
40 CFR 63.9(c)	Request for compliance extension	Yes	Except that 40 CFR 63.9(c) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that 40 CFR 63.9(d) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(e)	Notification of performance test	Yes	Except that 40 CFR 63.9(e) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.9(g)(1)	Notification of performance evaluation	Yes	Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.

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Permit No.: 07100080

Date Received: 10/23/2007
Date Issued: 06/12/2015

General provisions citation	Subject of citation	Applies to Subpart	Explanation
		Except that 40 CFR 63.9(g) only applies as specified in 40 CFR 63.6645.	
40 CFR 63.9(h) (1) - (6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. 40 CFR 63.9(h) (4) is reserved.
			Except that 40 CFR 63.9(h) only applies as specified in 40 CFR 63.6645.
40 CFR 63.9(i)	Adjustment of submittal deadlines	Yes	
40 CFR 63.9(j)	Change in previous information	Yes	
40 CFR 63.10(a)	Administrative provisions for recordkeeping/reporting	Yes	
40 CFR 63.10(b) (1)	Record retention	Yes	Except that the most recent 2 years of data do not have to be retained on site.
40 CFR 63.10(b) (2) (i) - (v)	Records related to SSM	No	
40 CFR 63.10(b) (2) (vi) - (xi)	Records	Yes	
40 CFR 63.10(b) (2) (xii)	Record when under waiver	Yes	
40 CFR 63.10(b) (2) (xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
40 CFR 63.10(b) (2) (xiv)	Records of supporting documentation	Yes	
40 CFR 63.10(b) (3)	Records of applicability determination	Yes	
40 CFR 63.10(c)	Additional records for sources using CEMS	Yes	Except that 40 CFR 63.10(c) (2) - (4) and (9) are reserved.
40 CFR 63.10(d) (1)	General reporting requirements	Yes	
40 CFR 63.10(d) (2)	Report of performance test results	Yes	
40 CFR 63.10(d) (3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
40 CFR 63.10(d) (4)	Progress reports	Yes	
40 CFR 63.10(d) (5)	Startup, shutdown, and malfunction reports	No	
40 CFR 63.10(e) (1) and (2) (i)	Additional CMS Reports	Yes	
40 CFR 63.10(e) (2) (ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.

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40 CFR 63.10(e)(3)	Excess emission and parameter exceedances reports	Yes	Except that 40 CFR 63.10(e)(3)(i)(C) is reserved.
40 CFR 63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
40 CFR 63.10(f)	Waiver for recordkeeping/reporting	Yes	
40 CFR 63.11	Flares	No	
40 CFR 63.12	State authority and delegations	Yes	
40 CFR 63.13	Addresses	Yes	
40 CFR 63.14	Incorporation by reference	Yes	
40 CFR 63.15	Availability of information	Yes	

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b. 40 CFR 63 Subpart A and Subpart AAAA - Municipal Solid Waste Landfills

Pursuant to 40 CFR 63 Subpart A and Subpart AAAA, the Permittee shall comply with the following applicable General Provisions as indicated:

<i>General Provision Citation</i>	<i>General Provision Applicable?</i>	<i>Subject of Citation</i>	<i>Explanation (if required)</i>
63.1(a)	Yes	Applicability: general applicability of NESHAP in this Part	Affected sources are already subject to the provisions of paragraphs (a)(10)-(12) through the same provisions under 40 CFR, Part 60 Subpart A.
63.1(b)	Yes	Applicability determination for stationary sources	
63.1(e)	Yes	Title V permitting	
63.2	Yes	Definitions	
63.4	Yes	Prohibited activities and circumvention	Affected sources are already subject to the provisions of paragraph (b) through the same provisions under 40 CFR, Part 60 Subpart A.
63.5(b)	Yes	Requirements for existing, newly constructed, and reconstructed sources	
63.6(e)	Yes	Operation and maintenance requirements, startup, shutdown and malfunction plan provisions	
63.6(f)	Yes	Compliance with nonopacity emission standards	Affected sources are already subject to the provisions of paragraphs (f)(1) and (2)(i) through the same provisions under 40 CFR, Part 60 Subpart A.
63.10(b)(2)(i) - (b)(2)(v)	Yes	General recordkeeping requirements	
63.10(d)(5)	Yes	If actions taken during a startup, shutdown and malfunction plan are consistent with the procedures in the startup, shutdown and malfunction plan, this information shall be included in a semi-annual startup, shutdown and malfunction plan report. Any time an action taken during a startup, shutdown and malfunction plan is not consistent with the startup, shutdown and malfunction plan, the source shall report actions taken within 2 working days after commencing such actions, followed by a letter 7 days after the event	
63.12(a)	Yes	These provisions do not preclude the State from adopting and enforcing any standard, limitation, etc., requiring permits, or requiring emissions reductions in excess of those specified	
63.15	Yes	Availability of information and confidentiality	

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Section 8 - State Only Requirements**1. Permitted Emissions for Fees**

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

<i>Pollutant</i>		<i>Tons/Year</i>
Volatile Organic Material	(VOM)	2.19
Sulfur Dioxide	(SO ₂)	1.68
Particulate Matter	(PM)	5.78
Nitrogen Oxides	(NO _x)	43.00
HAP, not included in VOM or PM	(HAP)	---
Total		54.27

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Attachment 1 - List of Emission Units at This Source

<i>Section</i>	<i>Emission Units</i>	<i>Description</i>
4.1	Engine Generators MSW Landfill Requirements (NSPS WWW, NESHAP AAAA)	Two (2) landfill gas fired internal combustion engines, each with a rated heat input of 13.75 mmBtu/hr, and electricity generator sets.
4.2	Landfill Gas Engines (NESHAP 40 CFR 63 Subpart ZZZZ)	Two (2) landfill gas fired internal combustion engines, each with a rated heat input of 13.75 mmBtu/hr, and electricity generator sets.

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Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound

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m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

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Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #1</p> <p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p> <p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p> <p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

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Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

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Attachment 5 - USEPA Site-Specific Determination

At the time of issuance of this permit, the USEPA has not made a site-specific determination related to the treatment of landfill gas for this source.

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